

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

GREENBERG TRAURIG, LLP

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*Co-counsel to JPMorgan Chase Bank, N.A., as
Administrative Agent*

In re:

Bed Bath & Beyond Inc., *et al.*,

Debtors.¹

Case No.: 23-13359 (VFP)

Chapter: 11

Joint Administration Requested

**APPLICATION FOR THE *PRO HAC VICE*
ADMISSION OF MARSHALL S. HUEBNER, ESQ.**

JPMorgan Chase Bank, N.A. (“**Chase**”), by and through its undersigned co-counsel, Greenberg Traurig, LLP, respectfully makes this application (the “**Application**”), for *pro hac vice* admission of Marshall S. Huebner, Esq., and represents as follows:

1. On April 23, 2023, the above-captioned debtors and debtors-in-possession (the “**Debtors**”), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, as amended the (“**Chapter 11 Cases**”) in the United States Bankruptcy Court for the District of New Jersey.

2. Mr. Huebner is a partner of the firm of Davis Polk & Wardwell LLP, which

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

maintains offices at, among other places, 450 Lexington Avenue, New York, NY 10017. Because of his familiarity with the facts and circumstances relevant to the Debtors in the within matter, Chase requests that Mr. Huebner be allowed to appear *pro hac vice* for the purposes of representing Chase, as administrative agent to the Debtors' prepetition revolving loan facility and secured creditor of the Debtors, in connection with the Chapter 11 Cases.

3. As set forth in the accompanying Declaration of Marshall S. Huebner, Esq., Mr. Huebner is a member in good standing of the bars of the State of New York, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Sixth Circuit, the United States District Court for the Eastern District of Michigan, the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, the United States District Court for the Western District of Michigan, and the United States Supreme Court. Mr. Huebner is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Huebner has represented that he will adhere to the disciplinary jurisdiction of this Court. Mr. Huebner also has represented that he will arrange with the New Jersey Lawyer's Fund for Client Protection for payment of the applicable annual fee under New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant

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to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit Marshall S. Huebner, Esq. *pro hac vice* in the above-captioned matter.

Dated: April 23, 2023

Respectfully submitted,

/s/ Alan J. Brody
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